

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
THE UNITED STATES OF AMERICA

- against -

**NOTICE OF MOTION
TO INTERVENE AND
FOR THE RELEASE OF
DOCUMENTS UNDER
SEAL**

GHISLAINE MAXWELL

Case No.: 20-CR-330 (AJN)

Defendant.
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PLEASE TAKE NOTICE that Applicant in Intervention, Juror 50 (“Applicant”), hereby moves the Court to grant him the right to intervene in the above-captioned case for the purpose of defending his significant and threatened privacy interests regarding his experience(s) as a survivor of past sexual assault.

On January 5, 2022, this Court ordered the parties to submit briefs in which each shall “address whether an inquiry of some kind is permitted and/or required, and, if so, the nature of such an inquiry”. Order. 1. Jan. 5, 2022. 20-CR-330. The Court further ordered that “If counsel for the juror wishes to be heard on the issue of the appropriateness of an inquiry, briefing by the juror’s counsel may be filed by January 26, 2022.” Order. 1. Jan. 5, 2022. 20-CR-330.

As this Court has already set forth a briefing schedule in this matter, Applicant agrees to follow the briefing schedule as directed by the Court, should the instant motion allowing him to intervene be granted.

As another preliminary matter, Juror 50 seeks to have copies of his Jury Questionnaire and the transcript of his voir dire released under seal to his counsel, the Prosecution, and Defense

Counsel so that he may make a knowing determination as to whether or not he “wishes to be heard on the issue of the appropriateness of an inquiry, briefing by the juror’s counsel may be filed by January 26, 2022”. Order. 1. Jan. 5, 2022. 20-CR-330.

Applicant files concurrently herewith a Memorandum in Support of Motion to Intervene, by Todd A. Spodek, Esq., dated January 10, 2022.

WHEREFORE, Applicant in Intervention respectfully request this Court grant his Motion to Intervene in this matter as of right, or in the alternative, for permissive intervention, and that the Court grant his application in all other respects.

Dated: New York, New York
January 10, 2022

Respectfully Submitted,

/S/

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